

1 BILL LOCKYER,
Attorney General
2 ALBERT NORMAN SHELDEN,
Acting Senior Assistant Attorney General
3 MICHELE R. VAN GELDEREN, Bar No. 171931
Deputy Attorney General
4 300 So. Spring Street, Suite 500
Los Angeles, California 90013
5

6 Attorneys for Plaintiff,
7 the People of the State of California
8

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 FOR THE COUNTY OF LOS ANGELES
11 SOUTHEAST DISTRICT

12 THE PEOPLE OF THE STATE OF
13 CALIFORNIA,

14 Plaintiff,

15 v.

16 CALIFORNIA ALTERNATIVE HIGH
SCHOOL, a California corporation;
17 CALIFORNIA ALTERNATIVE ADULT HIGH
SCHOOL, a California corporation; WEST SIDE
18 EDUCATION CORPORATION, a California
corporation; DANIEL A.D. GOSSAI a.k.a.
19 DEONAUTH GOSSAI, an individual; JANET H.
GOSSAI, an individual; DAVID L. SOTO, an
20 individual; NOEL BRITO, an individual;
FABRICIO SANDOVAL, an individual;
21 JANIRA JACOBS, an individual; and DOES 1
THROUGH 100, inclusive,

22 Defendants.
23
24
25
26
27
28

CASE NO.

COMPLAINT FOR CIVIL PENALTIES,
INJUNCTION AND OTHER
EQUITABLE RELIEF

1 Plaintiff, the People of the State of California (the “People” or “Plaintiff”), is informed
2 and believes, and on such information and belief alleges:

3 THE DEFENDANTS

4 1. California Alternative High School is a California corporation located in Lomita,
5 California.

6 2. California Alternative Adult High School is a California corporation located in
7 Lomita, California.

8 3. West Side Education Corporation (“West Side”) is a California corporation
9 located in South Gate, California.

10 4. Daniel A.D. Gossai a.k.a. Deonauth Gossai is a resident of Rancho Palos Verdes
11 in Los Angeles County, California. Mr. Gossai is the president and chief executive officer of the
12 California Alternative Adult High School and California Alternative High School corporations,
13 and as such manages, controls and directs the activities of each of these entities. He is the
14 “principal” of California Alternative High School. He is sued individually and as a
15 representative of these entities, which are referred to collectively as “CAHS.”

16 5. Janet H. Gossai is a resident of Rancho Palos Verdes in Los Angeles County,
17 California. She is the spouse of Defendant Daniel A.D. Gossai.

18 6. David L. Soto is a resident of San Bernardino County, California. He is the chief
19 executive officer of West Side, and as such manages, controls and directs the activities of that
20 entity. Mr. Soto is sued individually and as a representative of West Side.

21 7. Noel Brito is a resident of Los Angeles County, California. He is the director of
22 West Side, and as such manages, controls and directs the activities of that entity. Mr. Brito is
23 sued individually and as a representative of West Side.

24 8. Fabricio Sandoval is a resident of Los Angeles County, California. He is the
25 “director of admissions” and an instructor for CAHS, and as such manages, controls and directs
26 the activities of that entity. Mr. Sandoval is sued individually and as a representative of CAHS.

27 9. Janira Jacobs is a resident of Orange County, California. She is an administrator
28 and instructor for CAHS in Los Angeles County.

1 17. Consumers who enroll in the CAHS program are charged for the course and a
2 workbook. Consumers are also required to rent a cap and gown and to attend a “commencement
3 ceremony” at which they are awarded their “high school diploma.” For an additional fee,
4 Defendants also provide “official transcripts” to consumers who complete the CAHS program.

5 18. In statements to members of the public, Defendants make claims, including, but
6 not limited to, the following:

- 7 A. CAHS is recognized by both the State of California and the federal
8 government as an institution that is authorized to confer high school
9 diplomas.
- 10 B. Consumers who hold CAHS high school diplomas have been admitted to
11 accredited colleges and universities.
- 12 C. CAHS is recognized by the State of California, the federal government and
13 the United States Department of Education for students to participate in
14 financial aid programs at accredited colleges and universities.
- 15 D. A CAHS high school diploma fulfills employers’ requirements that
16 employees have a high school diploma.

17 19. In fact, among other things,

- 18 A. CAHS is not recognized by the State of California or the federal
19 government as an institution that is authorized to award high school
20 diplomas.
- 21 B. The CAHS program does not fulfill the requirements for admission to
22 accredited colleges and universities, including, but not limited to, the
23 California State University and/or the University of California systems.
- 24 C. CAHS is not recognized by the State of California, the federal government
25 or the United States Department of Education for students to participate in
26 federal and state financial aid programs at accredited colleges and
27 universities.

28 ///

1 D. Consumers who completed the CAHS program and received a CAHS high
2 school diploma have been rejected from employment opportunities that
3 require a high school diploma.

4 20. Defendants Daniel A.D. Gossai and Janet H. Gossai engage in a scheme whereby
5 Daniel A.D. Gossai transfers funds collected from the CAHS scheme, and title to property
6 purchased with such funds, to Janet H. Gossai for nominal or no consideration as a means to hide
7 those assets from consumer victims of CAHS and other judgment creditors. Daniel A.D. Gossai
8 continues to make use of, and to exercise control over, those assets.

9 **FIRST CAUSE OF ACTION**

10 **VIOLATION OF BUSINESS AND PROFESSIONS CODE SECTION 17500**

11 **(Untrue or Misleading Statements)**

12 **(Against All Defendants)**

13 21. The People reallege and incorporate by reference each of the paragraphs above, as
14 though fully set forth herein.

15 22. Defendants have violated and continue to violate Business and Professions Code
16 section 17500 by making or causing to be made untrue or misleading statements with the intent
17 to induce members of the public to purchase Defendants' services, when they knew or by the
18 exercise of reasonable care should have known the statements were untrue or misleading.

19 **SECOND CAUSE OF ACTION**

20 **VIOLATION OF BUSINESS AND PROFESSIONS CODE SECTION 17200**

21 **(UNFAIR COMPETITION)**

22 **(Against All Defendants)**

23 23. The People reallege and incorporate by reference each of the paragraphs above, as
24 though fully set forth herein.

25 24. Defendants have engaged in acts of unfair competition as defined in Business and
26 Professions Code section 17200, including, but not limited to, the following:

27 A. Defendants have violated Business and Professions Code section 17500,
28 as alleged above in the First Cause of Action.

